

A primary purpose of the Amateur Radio Service is to "supply a reservoir of trained operators".

The FCC still requires Commercial paging and other transmitters to identify in CW so that "Intermod" and transmissions from a malfunctioning unattended transmitter can be identified and diagnosed. This has proven inexpensive and effective.

Dropping the requirement for a class of amateur license to be able to copy the CW identification will require that the FCC devise and require universal implementation of a replacement "Foolproof" method to identify a malfunctioning unattended transmitter. The financial burden on the owners of the thousands of transmitters now being identified with the simple CW method will be significant.

I therefore submit that it is in the national interest to either reinstate the commercial telegraph license operator requirement for all commercial radio companies servicing transmitters using a CW identifier, or maintain the CW requirement for the "top" class of Amateur license at a speed equal to or above the highest legal CW identifier speed.

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